

Annual 47 C.F.R 64.2009(e) CPNI Certification

EB Docket No. 06-36

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Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 24, 2015

Name of Company(s) covered by this certification: Greenfield Communications, Inc.

Form 499 Filer ID: 823342

Name of signatory: Mike Powers

DOCKET FILE COPY ORIGINAL

Title of signatory: CEO/President

I, Michael J. Powers, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached is the certification of an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



STATEMENT of CPNI PROCEDURES AND COMPLIANCE

Greenfield Communications, Inc. ("Greenfield") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Should Greenfield elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 C.F.R Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer's (and all related parties') approval is obtained before CPNI is used or disclosed.

Greenfield has instituted training procedures to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI. According to required procedure, a customer must verify they are the customer of record by providing his/her mother's maiden name or a previously established password prior to the Company's providing any information on the account.

Although this has not occurred to date, any requests for CPNI by law enforcement agencies would only be granted if a subpoena is provided or if the applicable customer provides written permission.

If ever requested and provided, Greenfield will maintain a record of all instances where CPNI is disclosed or provided to third parties where allowed access to CPNI.

SEE ATTACHED CERTIFICATE

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

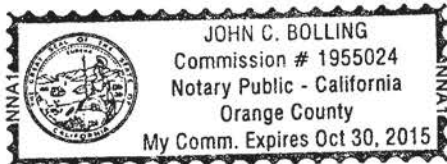
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
 County of Orange)
 On February 27, 2015 before me, John C. Bolling, Notary Public,
 Date Here Insert Name and Title of the Officer
 personally appeared Michael Joseph Powers
 Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/~~she/they~~ executed the same in his/~~her/their~~ authorized capacity(ies), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature John C. Bolling
 Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: CPNI Certification Document Date: February 24, 2015
 Number of Pages: 2 Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____
☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☒ Individual ☐ Attorney in Fact
☐ Trustee ☐ Guardian or Conservator
☐ Other: _____
 Signer Is Representing: _____

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☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Individual ☐ Attorney in Fact
☐ Trustee ☐ Guardian or Conservator
☐ Other: _____
 Signer Is Representing: _____